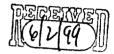
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May 10, 1999



Elizabeth Yetley, Ph.D.
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
Food & Drug Administration
200 C Street SW
(HFS-450)
Washington, D.C. 20204

Dear Dr. Yetley:

This letter is to notify you that we are offering for sale Alpha-Lipoic Acid, 100 mg as a dietary supplement. It contains the following structure/function statement: "Provides Metabolic and Antioxidant Support".

Our label contains the proper disclaimer as well.

Thank you.

Patricia Kim

Technical Nutrition Assistant

PK/jlh

<u>LET3</u> 7/2 65440 • (714)752-7309